

1 that Defendants have not and will not adjudicate an application for a U visa until
2 after they promulgate implementing regulations, something Defendants have
3 failed to do for six years.
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5 53. Plaintiff ELIZABETH LOPEZ GOMEZ is a victim of felonious assault,
6 infliction of corporal injury, and criminal threats. Section 1512 of the Crime
7 Victims Act of 2000 declares the victims of such crimes eligible for U visas.
8 Plaintiff LOPEZ GOMEZ reported these crimes to the Menlo Park Police
9 Department, and the perpetrator was arrested and prosecuted as a result. On or
10 about April 30, 2004, a San Mateo County deputy district attorney certified that
11 plaintiff LOPEZ GOMEZ possesses information concerning this criminal activity
12 and was being helpful in the prosecution of the perpetrator. On or about May 21,
13 2004 plaintiff LOPEZ GOMEZ presented defendants with a written request for
14 benefits under the Crime Victims Act. Defendants have refused and failed to
15 issue regulations or to grant plaintiff LOPEZ GOMEZ a U visa. On information and
16 belief, defendants have not and will not adjudicate an application for a U visa
17 until after they promulgate implementing regulations, something they have
18 failed to do for more than six years.
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22 54. Plaintiff MARIA ESTERVINA PEREZ is a victim of the infliction of corporal
23 injury and criminal assault. Section 1512 of the Crime Victims Act of 2000
24 declares the victims of such crimes eligible for U visas. Plaintiff ESTERVINA PEREZ
25 reported these crimes to the Menlo Park Police Department, and the perpetrator
26 was arrested and prosecuted as a result. On or about May 4, 2004, a San Mateo
27 County deputy district attorney certified that plaintiff ESTERVINA PEREZ
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1 possesses information concerning this criminal activity and was being helpful to
2 the prosecution of the perpetrator. On or about July 28, 2004 Plaintiff ESTERVINA
3 PEREZ presented defendants with a written request for benefits under the Crime
4 Victims Act. Defendants have refused and failed to issue regulations or to grant
5 plaintiff ESTERVINA PEREZ a U visa. On information and belief, Plaintiff
6 ESTERVINA PEREZ alleges that Defendants have not and will not adjudicate an
7 application for a U visa until after they promulgate implementing regulations,
8 something they have failed to do for more than six years.
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11 55. Plaintiff GIOVANA SAAVEDRA ANGULO is a victim of criminal domestic
12 violence perpetrated by her husband in 2005. In or around July 2005, Plaintiff
13 SAAVEDRA ANGULO called the Newark police and reported the crime. Section
14 1512 of the Crime Victims Act of 2000 declares the victims of such crimes eligible
15 for U visas. Plaintiff SAAVEDRA ANGULO gave detailed statements to law
16 enforcement officials regarding this crime, and the perpetrator was arrested for
17 and charged with criminal domestic violence. The perpetrator was convicted.
18 Despite Plaintiff SAAVEDRA ANGULO's cooperation, the documented domestic
19 violence, and the guilty plea in this case, both the Newark Police Department
20 that arrested the perpetrator, and the Alameda County District Attorney's office
21 that prosecuted the perpetrator, declined as a matter of policy to sign a U
22 certification. On or about November 21, 2006, Plaintiff SAAVEDRA ANGULO
23 presented defendants with a written request for benefits under the Crime
24 Victims Act. On information and belief, Plaintiff SAAVEDRA ANGULO alleges that
25 defendants have not and will not adjudicate an application for a U visa until and
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1 unless defendants first issue implementing regulations, including regulations
2 addressing the circumstance when a crime victim is unable to secure a U
3 certification from a local law enforcement agency.
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5 56. Plaintiff ELEUTERIO RODRIGUEZ RUIZ is a victim of felonious
6 aggravated assault, false imprisonment, and unlawful criminal restraint. On or
7 about April 10, 2005, he was falsely imprisoned at gunpoint and otherwise
8 victimized in an act of vigilante violence along the Mexico-United States border
9 in the State of Arizona; he suffered extreme mental abuse as a result. Section 1512
10 of the Crime Victims Act of 2000 declares the victims of such crimes eligible for U
11 visas. Plaintiff RODRIGUEZ RUIZ gave detailed statements to law enforcement
12 officials regarding this crime, and the perpetrator was arrested for felonious
13 aggravated assault with a deadly weapon. A law enforcement officer has
14 certified that plaintiff RODRIGUEZ RUIZ possesses information concerning the
15 criminal activity, has been helpful to local law enforcement in its investigation,
16 and remains willing to cooperate with any further investigation into the crime.
17 On or about June 30, 2005, Plaintiff RODRIGUEZ RUIZ presented defendants with a
18 written request for a U visa pursuant to the Crime Victims Act. However
19 defendants have failed to issue regulations implementing the U visa provisions
20 of the Crime Victims Act, and have failed to adjudicate Plaintiff RODRIGUEZ
21 RUIZ's application for a U visa. On information and belief, Plaintiff RODRIGUEZ
22 RUIZ alleges that defendants have not and will not adjudicate his application for
23 a U visa until and unless defendants first issue implementing regulations.
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1 57. Plaintiff FELIPE SANCHEZ MARTINEZ is a victim of felonious aggravated
2 assault, false imprisonment, and unlawful criminal restraint. On or about April
3 10, 2005, he was falsely imprisoned at gunpoint and otherwise victimized in an
4 act of vigilante violence along the Mexico-United States border in the State of
5 Arizona; he suffered extreme mental abuse as a result. Section 1512 of the Crime
6 Victims Act of 2000 declares the victims of such crimes eligible for U visas.
7 Plaintiff SANCHEZ MARTINEZ gave detailed statements to law enforcement
8 officials regarding this crime, and the perpetrator was arrested for felonious
9 aggravated assault with a deadly weapon. A law enforcement officer has
10 certified that plaintiff SANCHEZ MARTINEZ possesses information concerning the
11 criminal activity, has been helpful to local law enforcement in its investigation,
12 and remains willing to cooperate with any further investigation into the crime.
13 On or about June 30, 2005, plaintiff SANCHEZ MARTINEZ presented defendants
14 with a written request for a U visa pursuant to the Crime Victims Act. However
15 defendants have failed to issue regulations implementing the U visa provisions
16 of the Crime Victims Act, and have failed to adjudicate plaintiff SANCHEZ
17 MARTINEZ's application for a U visa. On information and belief, plaintiff
18 SANCHEZ MARTINEZ alleges that defendants have not and will not adjudicate his
19 application for a U visa until and unless defendants first issue implementing
20 regulations.
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26 58. Plaintiff FRANCISCA RAMIREZ ALVAREZ is a victim of criminal domestic
27 violence and is statutorily eligible for the issuance of a U visa. Plaintiff RAMIREZ
28 ALVAREZ was threatened with guns and knives and was beaten and sexually

1 assaulted. Plaintiff RAMIREZ ALVAREZ has been issued a U visa certification,
2 signed by a law enforcement official on March 18, 2002, stating that Plaintiff
3 RAMIREZ ALVAREZ has been helpful to local law enforcement in its criminal
4 investigation. On or about June March 19, 2002, she petitioned the local
5 Louisville, KY Immigration and Naturalization Service (INS) office for a U visa
6 or deferred action status. Having been granted no benefits, on or about January
7 2, 2003, Plaintiff RAMIREZ ALVAREZ petitioned the Vermont Service Center of INS
8 for relief under the Crime Victims Act. She was finally granted deferred action
9 status on or about October 17, 2003. On information and belief, Plaintiff RAMIREZ
10 ALVAREZ alleges that Defendants have not and will not adjudicate her a U visa
11 until and unless Defendants first issue implementing regulations.

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15 59. Plaintiff CONSTANTINA CAMPOS was a victim of domestic violence in
16 the City of New York. The perpetrator was arrested and prosecuted in Kings
17 County Criminal Court and Plaintiff CAMPOS received a Criminal Court Order of
18 Protection against him. Section 1512 of the Crime Victims Act declares the
19 victims of such crimes eligible for U visas. Plaintiff CAMPOS reported these
20 crimes to the New York City Police Department and a law enforcement official
21 certified that Plaintiff CAMPOS has been helpful in the prosecution of the crime.
22 On or about June 21, 2002, and several times thereafter, Plaintiff CAMPOS has
23 presented Defendants with written request for relief under the Crime Victims
24 Act. Defendants have refused and failed to issue regulations or to grant Plaintiff
25 CAMPOS a U visa. On information and belief, Plaintiff CAMPOS alleges that
26 Defendants have not and will not adjudicate an application for a U visa until
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1 after they promulgate implementing regulations, something Defendants have
2 failed to do for six years.

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4 60. Plaintiff IRMA MORENO SANVICENTE is a victim of domestic violence
5 perpetrated by her husband. Plaintiff MORENO SANVICENTE has suffered
6 substantial physical and mental harm as a result. In or around March of 2005,
7 Plaintiff MORENO SANVICENTE's husband was arrested following an incident of
8 domestic violence. Her husband was prosecuted in New York County Criminal
9 Court. Plaintiff MORENO SANVICENTE cooperated with the police and District
10 Attorney throughout the investigation and prosecution of the crime. Plaintiff
11 MORENO SANVICENTE obtained a certification from the New York County
12 District Attorney's Office describing her cooperation. In or around late 2005,
13 Plaintiff MORENO SANVICENTE presented Defendants with a written request for
14 relief under the Crime Victims Act. On November 15, 2005, Defendants refused
15 to grant relief on the basis that her law enforcement certification was not signed
16 within six months of her request. Plaintiff MORENO SANVICENTE sought and
17 obtained an updated U certification. On or about February 3, 2006, Plaintiff
18 MORENO SANVICENTE presented Defendants with a second request for benefits
19 under the Crime Victims Act. She was eventually granted deferred action status
20 however she has not been granted U visa status and her 17-year old daughter
21 who remains in México is in danger of "aging out" of U visa derivative
22 eligibility. Plaintiff MORENO SANVICENTE is unable to reunite with her daughter
23 because of defendants' failure to issue U visas or derivative U visas.
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1 61. Plaintiff ROSA GALAVIZ is a victim of criminal domestic violence
2 perpetrated by her husband. Plaintiff GALAVIZ has suffered substantial physical
3 and mental abuse as a result of this criminal abuse. On or about March 20, 2006,
4 her husband pled guilty to charges of domestic battery against Plaintiff GALAVIZ
5 and was sentenced to a period of incarceration. In or about May 2006 Plaintiff
6 GALAVIZ's husband was deported to México and now resides with Plaintiff
7 GALAVIZ's seven minor children, the oldest of whom is 14 years of age. In 2006,
8 a Deputy Prosecuting Attorney from Marion County, Indiana certified that
9 Plaintiff GALAVIZ had been helpful in the criminal investigation and prosecution.
10 On or about June 28, 2006, Plaintiff GALAVIZ petitioned the USCIS for benefits
11 under the Crime Victim Act. On or about February 13, 2007, Plaintiff GALAVIZ
12 also petitioned the USCIS on behalf of her seven minor children in México,
13 seeking to reunite with them in the United States and remove them from the
14 danger of their abusive father. Defendants have refused and failed to issue
15 regulations or to grant Plaintiff ROSA GALAVIZ's or her children U visas. On
16 information and belief, Plaintiff GALAVIZ alleges that Defendants have not and
17 will not adjudicate an application for a U visa until after they promulgate
18 implementing regulations, something Defendants have failed to do for six years.
19 Defendants' failure and refusal to grant Plaintiff ROSA GALAVIZ a U visa blocks
20 her ability to travel abroad and to seek reunification with her dependent children
21 in a timely manner that protects their safety and well-being.

22 62. Plaintiff MARIA LUISA ARROYO TORRES is a victim of criminal assault
23 and domestic violence perpetrated by her ex-husband. She reported these crimes
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1 to the Hidalgo County Sheriff's Department on or about September 11, 2004 and
2 August 2, 2005. On or about July 10, 2006, she petitioned the USCIS for benefits
3 under the Crime Victims Act. Plaintiff ARROYO TORRES submitted her application
4 with a U certification signed on or about August 5, 2005 by Assistant Criminal
5 District Attorney of the County of Hidalgo, stating that Plaintiff ARROYO TORRES
6 possesses information concerning the criminal activity, has been helpful to local
7 law enforcement in its investigation, and remains willing to cooperate with any
8 further investigation into the crime. That certification was issued more than six
9 months before Plaintiff ARROYO TORRES applied for a U visa or deferred action
10 status. In or about October 2006 defendants denied Plaintiff ARROYO TORRES
11 relief under the Crime Victims Act because her U certification was signed more
12 than six months before it was submitted to the USCIS. On or about December 1,
13 2006, Plaintiff TORRES received a denial of her employment authorization
14 application.
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18 63. Plaintiff JUAN FRANCISCO ROCHA ROCHA is a victim of felonious
19 assault and attempted murder perpetrated by unknown assailants. Plaintiff
20 ROCHA ROCHA suffered substantial physical and mental abuse as a result, as did
21 his wife and two young sons. A law enforcement officer has certified that
22 Plaintiff ROCHA ROCHA and his family have been helpful to law enforcement in
23 the investigation of the crime. On or about November 30, 2006, Plaintiff ROCHA
24 ROCHA and each of his family members submitted applications for relief under
25 the Crime Victims Act, concurrently with applications for employment
26 authorization. On or about January 17, 2007, Plaintiff ROCHA ROCHA's
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1 application for employment authorization was denied, on information an belief
2 based upon defendants' new policy of not accepting employment authorization
3 applications until the defendants have granted an applicant deferred action
4 status. Defendants have refused and failed to issue regulations or to grant
5 Plaintiff ROCHA ROCHA a U visa. On information and belief, Plaintiff ROCHA
6 ROCHA alleges that Defendants have not and will not adjudicate an application
7 for a U visa until after they promulgate implementing regulations, something
8 Defendants have failed to do for six years.

11 64. Plaintiff JORGE DOMINGUEZ RIVERA is a victim of felonious assault
12 perpetrated by a U.S. Border Patrol agent on January 12, 2007, when that agent
13 tried to run Plaintiff DOMINGUEZ RIVERA over with his vehicle. That same day,
14 Plaintiff DOMINGUEZ RIVERA witnessed the same Border Patrol agent shoot and
15 kill his brother, Francisco Javier Dominguez Rivera. Plaintiff DOMINGUEZ
16 RIVERA has suffered substantial mental abuse as a result. On or about February
17 24, 2007, Plaintiff DOMINGUEZ RIVERA petitioned the USCIS for a U visa or
18 deferred action status. A U certification has not been issued by any
19 representative of the Government currently investigating the January 12, 2007
20 incident, though requests have been made in an effort to obtain such
21 certification. Defendants have threatened Plaintiff DOMINGUEZ RIVERA with
22 execution of an order of expedited removal before his application for a U visa is
23 adjudicated. Defendants have refused and failed to issue regulations and to
24 adjudicate Plaintiff DOMINGUEZ RIVERA's application for a U visa. On
25 information and belief, Plaintiff DOMINGUEZ RIVERA alleges that Defendants
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1 have not and will not adjudicate his application for a U visa until after they
 2 promulgate implementing regulations, something Defendants have failed to do
 3 for six years.

4 VI

5 IRREPARABLE INJURY

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 7 65. Plaintiffs and those similarly situated are suffering and will continue to
 8 suffer irreparable injury unless this Court orders relief as prayed for herein. Such
 9 injury includes, *inter alia*, deprivation of due process and equal protection
 10 through withholding of U visas. Damages cannot adequately address the injuries
 11 suffered by plaintiffs and their proposed class members, including the inability
 12 to legalize their immigration status in a manner made available by Congress and
 13 the loss of ancillary benefits available to U visa holders.
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15 VII

16 FIRST CAUSE OF ACTION

17 [Failure to promulgate regulations implementing U visa program]

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 19 66. Plaintiffs incorporate by this reference the allegations set out in ¶¶ 1-65
 20 above as though fully re-alleged here.
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22 67. Defendants' failure to promulgate regulations implementing 8 U.S.C. §
 23 1101(a)(15)(U) is agency action unlawfully withheld or unreasonably delayed, is
 24 arbitrary, capricious, an abuse of discretion, otherwise not in accordance with
 25 law, and violates (i) the Victims Protection Act of 2000, Pub. L. No. 106-386, Div.
 26 A, 114 Stat. 1464 (2000), *codified at, inter alia*, 8 U.S.C. § 1101(a)(15)(U); (ii) the
 27 Immigration and Nationality Act, 8 U.S.C. § 1103; (iii) the Violence Against
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1 Women and Department of Justice Reauthorization Act of 2005, Pub. L. 109-162,
 2 119 Stat. 2960 (2006); (iv) the Administrative Procedure Act, §§ 5 U.S.C. §§ 551 *et*
 3 *seq.*; (v) the due process clause and equal protection guarantee of the Fifth
 4 Amendment to the United States Constitution; and (vi) Article II, §§ 1 and 3, of
 5 the United States Constitution.
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VIII

SECOND CAUSE OF ACTION

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 10 [Refusal to adjudicate U visa applications and issue U visas]

11 68. Plaintiffs incorporate by this reference the allegations set out in ¶¶ 1-65
 12 above as though fully re-alleged here.

13 69. Defendants' failure to adjudicate applications for U visas and refusal to
 14 issue U visas is agency action unlawfully withheld or unreasonably delayed, and
 15 is arbitrary, capricious, an abuse of discretion, otherwise not in accordance with
 16 law, and violates (i) the Victims Protection Act of 2000, Pub. L. No. 106-386, Div.
 17 A, 114 Stat. 1464 (2000), *codified at, inter alia*, 8 U.S.C. § 1101(a)(15)(U); (ii) the
 18 Immigration and Nationality Act, 8 U.S.C. § 1103; (iii) the Violence Against
 19 Women and Department of Justice Reauthorization Act of 2005, Pub. L. 109-162,
 20 119 Stat. 2960 (2006); (iv) the Administrative Procedure Act, §§ 5 U.S.C. §§ 551 *et*
 21 *seq.*; (v) the due process clause and equal protection guarantee of the Fifth
 22 Amendment to the United States Constitution; and (vi) Article II, §§ 1 and 3, of
 23 the United States Constitution.
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IX

THIRD CAUSE OF ACTION

[Refusal to adjudicate U visa applications Impact on the
Right to Work and Travel]

70. Plaintiffs incorporate by this reference the allegations set out in ¶¶ 1-65 above as though fully re-alleged here.

71. Defendants' failure to adjudicate applications for U visas and refusal to issue U visas also deny eligible immigrants employment authorization during the pendency of their U status and the ability to travel abroad without having to make separate applications which are often denied for each trip abroad and violates (i) the Victims Protection Act of 2000, Pub. L. No. 106-386, Div. A, 114 Stat. 1464 (2000), *codified at, inter alia*, 8 U.S.C. § 1101(a)(15)(U); (ii) the Immigration and Nationality Act, 8 U.S.C. § 1103; (iii) the Violence Against Women and Department of Justice Reauthorization Act of 2005, Pub. L. 109-162, 119 Stat. 2960 (2006); (iv) the Administrative Procedure Act, §§ 5 U.S.C. §§ 551 *et seq.*; (v) the due process clause and equal protection guarantee of the Fifth Amendment to the United States Constitution; and (vi) Article II, §§ 1 and 3, of the United States Constitution.

X

FOURTH CAUSE OF ACTION

[Failure to adjudicate applications for or issue derivative U visas]

72. Plaintiffs incorporate by this reference the allegations set out in ¶¶ 1-65 above as though fully re-alleged here.

73. Defendants' failure to adjudicate applications for derivative U visas and to issue derivative U visas is agency action unlawfully withheld or unreasonably delayed, and is arbitrary, capricious, an abuse of discretion, otherwise not in accordance with law, and violates (i) the Victims Protection Act of 2000, Pub. L. No. 106-386, Div. A, 114 Stat. 1464 (2000), *codified at, inter alia*, 8 U.S.C. § 1101(a)(15)(U); (ii) the Immigration and Nationality Act, 8 U.S.C. § 1103; (iii) the Violence Against Women and Department of Justice Reauthorization Act of 2005, Pub. L. 109-162, 119 Stat. 2960 (2006); (iv) the Administrative Procedure Act, §§ 5 U.S.C. §§ 551 *et seq.*; (v) the due process clause and equal protection guarantee of the Fifth Amendment to the United States Constitution; and (vi) Article II, §§ 1 and 3, of the United States Constitution.

XI

FIFTH CAUSE OF ACTION

[Unlawful failure to publish employment authorization
rule for notice and comment]

74. Plaintiffs incorporate by this reference the allegations set out in ¶¶ 1-65 above as though fully re-alleged here.

75. Defendants' failure to publish for notice and comment its rule forbidding plaintiffs and those similarly situated from applying for employment authorization until after they receive deferred action status violates (i) the Administrative Procedure Act, 5 U.S.C. §§ 551 *et seq.*; and (ii) the due process clause and equal protection guarantee of the Fifth Amendment to the United States Constitution.

XII

SIXTH CAUSE OF ACTION

[Failure to provide referrals to nongovernmental organizations]

76. Plaintiffs incorporate by this reference the allegations set out in ¶¶ 1-65 above as though fully re-alleged here.

77. Defendants' failure to provide plaintiffs and their class members with referrals to nongovernmental organizations is agency action unlawfully withheld or unreasonably delayed, and is arbitrary, capricious, an abuse of discretion, otherwise not in accordance with law, and violates (i) 8 U.S.C. § 1184(p)(3)(A); (ii) the Immigration and Nationality Act, 8 U.S.C. § 1103; (iii) the Violence Against Women and Department of Justice Reauthorization Act of 2005; (iv) the Administrative Procedure Act, §§ 5 U.S.C. §§ 551 *et seq.*; (v) the due process clause and equal protection guarantee of the Fifth Amendment to the United States Constitution; and (vi) Article II, §§ 1 and 3, of the United States Constitution.

XIII

SEVENTH CAUSE OF ACTION

[Unlawful rejection of law enforcement certifications]

78. Plaintiffs incorporate by this reference the allegations set out in ¶¶ 1-65 above as though fully re-alleged here.

79. Defendants' policy and practice to reject certificates of cooperation executed by law enforcement more than six months prior to the filing of U visa applications violates (i) 8 U.S.C. §§ 1101(U)(i)(III) and 1184(p)(1); and (ii) the due process clause and equal protection guarantee of the Fifth Amendment to the United States Constitution.

XIV

EIGHTH CAUSE OF ACTION

[Unlawful failure to issue U Certifications]

80. Plaintiffs incorporate by this reference the allegations set out in ¶¶ 1-65 above as though fully re-alleged here.

81. Defendants' policy and practice to reject or deny applications unaccompanied by U certifications when applicants are unable despite good faith efforts and U visa eligibility to obtain such certifications from other law enforcement agencies violates (i) 8 U.S.C. §§ 1101(U)(i)(III) and 1184(p)(1); and (ii) the due process clause and equal protection guarantee of the Fifth Amendment to the United States Constitution..

XV

NINTH CAUSE OF ACTION

[Unconstitutional Restriction on U Visa Eligibility]

82. Plaintiffs incorporate by this reference the allegations set out in ¶¶ 1-65 above as though fully re-alleged here.

83. 8 U.S.C. §§ 1101(U)(i)(III) in conjunction with 1184(p) operate to deny U visa eligibility to the immigrant parents of United States citizen children who are the victims of crimes and who or whose parents cooperated with law enforcement agencies in the investigation or prosecution of such crimes, while granting such benefit to the immigrant parents of undocumented and lawful permanent resident children. This unequal treatment is irrational and violates the equal protection guarantee of the Fifth Amendment to the United States Constitution.

XVI

PRAYER FOR RELIEF

WHEREFORE, plaintiffs pray that this Court —

1. Assume jurisdiction over this action;
2. Certify this action as a class action pursuant to Rule 23(b)(2), Fed.R.Civ.Proc.;
3. Declare that defendants' policies, procedures, and practices as alleged throughout this Complaint violate the Immigration and Nationality Act, as amended by the Victims Protection Act; the Violence Against Women and Department of Justice Reauthorization Act of 2005; the Administrative Procedure

Complaint

1 Act, 5 U.S.C. §§ 551 *et seq.*; the due process clause and equal protection guarantee
2 of the Fifth Amendment to the United States Constitution; and Article II, §§ 1
3 and 3, of the United States Constitution;

4
5 4. Issue preliminary and permanent injunctions requiring that Defendants,
6 their agents, employees, and successors in office timely adjudicate U visa
7 applications presented by the individual named Plaintiffs, their proposed class
8 members, and the members and clients of the organizational Plaintiffs,
9 promulgate regulations or procedures implementing the U visa provisions of the
10 Victims Protection Act, and otherwise comply with the terms of the Victims
11 Protection Act and other applicable laws when adjudicating applications filed by
12 the named Plaintiffs, their proposed class members, and the clients and members
13 of the organizational Plaintiffs;
14

15
16 5. Award Plaintiffs costs of suit and attorney's fees reasonably incurred as
17 a result of this lawsuit; and

18 6. Grant such further relief as the Court may deem just and proper.

19 Dated: March 6, 2007.

CENTER FOR HUMAN RIGHTS AND
CONSTITUTIONAL LAW

Peter A. Schey
Carlos R. Holguín
Cynthia Lucas

23 ASIAN PACIFIC ISLANDER LEGAL
24 OUTREACH

Victor M. Hwang
Ivy C. Lee

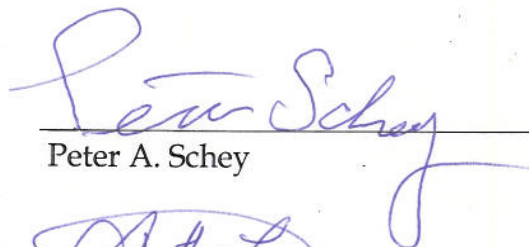
26 CENTRAL AMERICAN RESOURCE
27 CENTER
28 Daniel Sharp

SANCTUARY FOR FAMILIES
Julie E. Dinnerstein

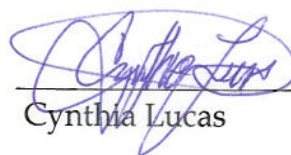
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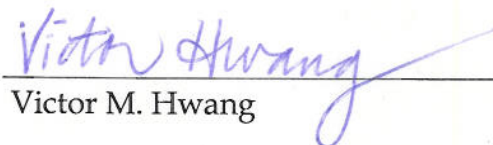
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